

## UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Kamol Niefa HARPER

Case: 2:22-mj-30033

Assigned To : Unassigned

Assign. Date : 1/20/2022

Case No.

Description: RE: SEALED MATTER  
(EOB)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 10, 2019 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

21 U.S.C. § 841

Possession with Intent to Distribute Controlled Substances

This criminal complaint is based on these facts:

See attached Affidavit

☐ Continued on the attached sheet.Sworn to before me and signed in my presence  
and/or by reliable electronic means.Date: January 20, 2022City and state: Detroit, MI*Complainant's signature*Special Agent Mandy Wilson, DEA*Printed name and title**Judge's signature*Hon. David R. Grand, United States Magistrate Judge*Printed name and title*

## **AFFIDAVIT**

I, Mandy Wilson, a Special Agent (SA) with the Drug Enforcement Administration (DEA), being duly sworn, depose and states as follows:

### **I. INTRODUCTION**

1. I have been employed as a Special Agent with DEA for 17 years and assigned to the Detroit Field Office. During your affiant's occupation as a Special Agent, your affiant has conducted and participated in hundreds of investigations into illicit trafficking, manufacturing and distribution of controlled substances. Your affiant's participation in these investigations resulted in the arrests and search and seizures related to federal narcotics trafficking, drug conspiracy and other drug related violations of federal narcotic laws.

2. I have attended schools and/or received significant training and been instructed in many aspects of narcotics investigations. I am familiar with the laws promulgated under Title 21 of the United States Code.

3. This affidavit contains information from numerous sources including, but not limited to, my own personal participation, in this investigation and my review and analysis of oral and written reports. This affidavit does not contain all the information known to law enforcement related to this investigation. This affidavit establishes probable cause that Kamol Niefa HARPER violated 21 U.S.C. § 841, possession with intent to distribute controlled substances.

## **II. SUMMARY OF THE INVESTIGATION**

4. In the Spring of 2019, the Drug Enforcement Administration (DEA) received information regarding the cocaine and heroin trafficking activities of Kamol HARPER and associates. During the course of investigation agents/officers identified HARPER as a kilogram cocaine and heroin narcotics trafficker.

5. On December 10, 2019, DEA agents/officers conducted physical and electronic surveillance at 17XXX Lenore, Detroit, Michigan. During the course of surveillance on December 10,

2019, at approximately 5:28 p.m., a 2010 Dodge Ram pick-up truck bearing Michigan registration EBA08XX, arrived at the Detroit residence. The vehicle subsequently parked in the driveway and was registered to Kamol Niefra HARPER (135XX Woodbine, Redford, Michigan).

6. At approximately 6:23 p.m., HARPER was observed as he entered his 2010 Dodge Ram and departed the Detroit residence.

7. DEA agents/officers maintained uninterrupted surveillance of HARPER as he traveled southbound on Telegraph Road before turning eastbound on Interstate 96. In coordination with DEA Detroit agents/officers, at approximately 6:40 p.m., Michigan State Police (MSP) Trooper Sonstrom effected a traffic stop of Kamol HARPER. HARPER's identity was verified by his Michigan Driver's License and was the sole occupant of the vehicle. HARPER advised that he was driving his truck, headed back to work from his house. Your affiant is aware that HARPER, under continuous surveillance, was on his way from the Detroit

residence at Lenore as opposed to his Redford, Michigan home as stated to police. Trooper Sonstrom asked HARPER if there was any cash or narcotics in the vehicle and HARPER denied the content of either. HARPER additionally advised that he was responsible for everything in the vehicle. Trooper Sonstrom asked HARPER for consent to search his vehicle, however, HARPER denied consent. HARPER was subsequently asked to exit the vehicle for the purpose of a narcotics K-9 search. During the course of the traffic stop, HARPER's behavior appeared nervous and Trooper Sonstrom ordered HARPER to exit the truck several times before he complied. HARPER was checked for weapons with negative results and was directed to stand by the patrol car awaiting a canine sniff.

8. Michigan State Police Canine "Nero," trained to detect the odor and/or presence of narcotics sniffed the exterior of the vehicle, giving a positive indication for narcotics. Canine "Nero" then entered the passenger side of the vehicle and additionally gave a positive indication for narcotics in a plastic bag located on

the passenger floor. Trooper Sonstrom subsequently entered the vehicle, locating the plastic bag containing approximately 568 grams of suspected cocaine. HARPER was arrested and later released pending criminal charges. Michigan State Police Laboratory conducted an analysis of the white powdery substance and it positively identified as cocaine.

9. As a result of the MSP traffic stop, agents/officers seized the following:

- a. 568 grams of cocaine (located on the passenger side floor of the 2010 Dodge Ram pick-up truck registered and occupied by Kamol Niefra HARPER.

10. Based on my training and experience, I know that that 568 grams of cocaine is consistent with a distribution amount of cocaine and is not for personal use.

### **III CONCLUSION**

11. Probable cause exists that Kamol Niefra HARPER possessed with intent to distribute a large quantity of cocaine, within the Eastern District of Michigan, in violation of 21 U.S.C. §841.



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Special Agent Mandy Wilson  
Drug Enforcement Administration

Sworn to before me and signed in my presence  
and/or by reliable electronic means



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HONORABLE DAVID R. GRAND  
UNITED STATES MAGISTRATE JUDGE

January 20, 2022